



EASTERN RESEARCH GROUP, INC.

MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency (EPA),
Office of Air Quality Planning Standards (OAQPS), (MD-13)

FROM: Susan Radomski, Eastern Research Group (ERG), Morrisville

DATE: April 23, 1998

SUBJECT: Summary of the April 7, 1998 Meeting of the Industrial Combustion Coordinated
Rulemaking (ICCR) Incinerator Work Group (IWG)

1.0 INTRODUCTION

- The primary purpose of the meeting was to review, discuss and revise draft Regulatory Alternatives Paper (RAP) introductory paragraphs, section 112 recommendations, subcategory definition sheets, and testing recommendations. A complete meeting agenda is included as attachment 1.
- The meeting was held on April 7, 1998 in Rosslyn, Virginia.
- A complete list of meeting attendees with their affiliations is included as attachment 2.

2.0 SUMMARY OF DISCUSSION AND DECISIONS

The meeting discussion generally followed the agenda. Topics of conversation are summarized in the following sections:

- 2.1 IWG Announcements and Updates
- 2.2 Discussion of RAP
- 2.3 Subteam Progress Reports
- 2.4 Updates and Support Group Reports
- 2.5 Where do we go from here?
- 2.6 Action Items

2.1 IWG Announcements and Updates

- Rick Crume of EPA informed the IWG that Subteam 3 had received copies of the survey forms returned by facilities in their subcategories. Mr. Crume also offered to talk to other interested subteams about obtaining survey copies for them.

- Rick Crume reported that the 200 facilities from which the Work Groups would like emission test data are being contacted. 80% - 90% of the facilities contacted do have data and will be receiving letters requesting copies of the test reports. The facilities will have one month to return the requested reports. IWG members expressed concern that one month is more time than necessary for the facilities to respond to the request. Norm Morrow of Exxon Chemical Americas and Rick Crume assured the IWG that the time frame is reasonable and may actually be too short for some large companies.

2.2 Discussion of RAP

Norm Morrow led a discussion with the IWG on the first draft of the RAP:

- Jeff Shumaker of International Paper raised the issues of the intended audience for the RAP and the ease with which changes may be made in the future. He expressed concern that the RAP will be broadly used, making it difficult to change the decisions discussed in the document. Jon Devine of EPA responded that the RAP should be viewed as a planning document written to show the progress of the Work Group. He also reiterated the fact that the RAP will be used to show the Coordinating Committee (CC) the accomplishments and milestones of the Work Group. The CC may then submit the information to EPA for use in developing the White Paper for submission to the litigants.
- The IWG reviewed the data sheets included in the draft RAP. Dick Van Frank of The National Audubon Society pointed out that Pollution Prevention needs to be included in the RAP. He also expressed concern over the lack of definition for solid waste, which EPA is expected to provide. He also objected to the proposal that pollutants and wastes burned be monitored on a quarterly basis. Rick Crume responded that the information on quarterly averaging was added to the RAP to prompt a discussion on the topic.

2.3 Subteam Progress Reports

- Subteam 1 reported that discussion on the definition of a pathological waste incinerator is on-going. The definition includes the cut-off level for percent pathological waste fired in the incinerator, but an exact number has not been determined. Rick Crume expressed concern that the proposed cut-off of 90% pathological waste to 10% other material may allow some incinerators to “fall through the cracks” and avoid coverage by the rule. Norm Morrow replied that any such facilities would probably end up being covered under other subcategories.
- Subteam 1 also discussed their testing recommendations. They will forward a revised copy of the recommendations to the Work Group for suggestions. The revisions may be forwarded to Rick Crume for inclusion in the IWG presentation at the next CC meeting.

- Subteam 2 reported that they have nearly finished analyzing the available data and found that their units may be similar enough to justify a single subcategory. Norm Morrow reported that the subteam looked at the entire incinerator inventory database and removed records for units being handled by the other subteams. They found that the remaining units fall into the scope of their subteam.
- Subteam 3 reported the development of four subcategories, but there are very few units in any of them. The subteam contacted all the facilities with units believed to be agricultural units. They found that none of the units in question are agricultural units, and provided a list (attachment 3) indicating the Work Group or subteam who should be considering each unit. By contacting the facilities directly, the subteam also determined that the 11 units identified as having controls do not belong in any of the subteam's categories. They will be turfed to the appropriate Work Groups. The subteam will continue calling their remaining 23 units and forward any information obtained to EPA to be forwarded on to ERG.
- Subteam 4 presented their updated data sheet for drum reclaimers (attachment 4) and their preliminary testing needs for drum reclaimers (attachment 5). The testing proposal was accepted by the IWG for submittal to the CC. The testing needs for metal parts reclaimers require further consideration and will be addressed at a later date. Doug Finan of GlaxoWellcome expressed concern that the subteams are trying to plan affordable tests instead of recommending the testing needed to fill data gaps. He suggested that the subteams recommend any testing they believe to be necessary instead of the testing they believe will fit in the budget.
- The IWG reached consensus on recommending to the CC that units used for scrap metal recovery, halogenated off-gas flaring and landfill gas flaring be referred to EPA to be addressed under their respective non-ICCR MACT standards.

2.4 Updates and Support Group Reports Subteam Progress Reports

- Beth Berglund of Merck and Co. offered an update on the Pollution Prevention Subgroup formed by the CC. The subgroup reached consensus on a draft of an Operator Training/Qualification document. The Subgroup will provide a package at the next CC meeting of consensus documents and concept papers outlining the work done by the subgroup. Jeff Shumaker expressed concern that the Operator Training/Qualification document requires that all operators be certified by outside testing. Ms. Berglund responded that the document allows for internal testing at a facility, as well. She also pointed out that the term "operator" will be defined for each unit type, possibly by the Work Groups, if the CC decides to forward the document on for consideration.

- Susan Radomski of Eastern Research Group reported that 2051 of the 3200 surveys sent out in the second mailing of the Information Collection Request (ICR) have been returned and will be included in the next version of the Survey Database. These returns include information on over 600 units. Also about 40 reports are being added to the Emission Test Database, the next version of which should be completed by the end of April. Some Work Group members expressed concern over how data from the emission test reports and incoming ICR responses may be viewed. A Work Group member also expressed the opinion that test reports often contain more data than are available through the Emission Test Database. Rick Crume agreed to discuss alternative methods for distributing the information to the Work Group with ERG.

2.5 Where do we go from here?

- Rick Crume discussed the upcoming milestones. The current milestone schedule calls for the continued revision of the first draft of the RAP. A second version will be prepared for the May 28 IWG meeting, with Work Group changes completed in time to submit the official first draft to the CC for review prior to the July meeting.
- Rick Crume presented a diagram created by Tom Waddell of Eastern Research Group (attachment 6). The diagram showed that information about incinerators has been received from approximately 1800 facilities due to the ICR.

2.6 Action Items

- Paul Rahill of Industrial Equipment and Engineering Company will forward a copy of his subteam's testing recommendations to the IWG for revisions. Any changes should be forwarded to Rick Crume.
- Subteam 3 will decide if their three wood subcategories should be combined into a single subcategory for the purpose of the RAP. If they decide to combine the subcategories, they will forward their completed data sheet to Rick for inclusion in the draft RAP presented at the next CC meeting.
- Rick Crume will follow up on the distribution of the emission test reports as EPA receives them.
- Rick Crume and ERG will discuss a method of distribution of the newest survey responses.
- Rick Crume and Norm Morrow will incorporate several suggestions on the draft RAP, including a place holder for Pollution Prevention, to be presented to the CC.

3.0 UPCOMING MEETINGS

- May 27 and 28: Subteam and Work Group meetings in Durham, North Carolina.
- July 7: Work Group meeting at the Pittsburgh Airport.

ICCR INCINERATOR WORK GROUP MEETING
April 7, 1998, Chemical Manufacturers Association
Rosslyn, VA

Activities and Decisions

- Rick Crume reported that the 200 facilities from which the Work Groups would like emission test data are being contacted. 80% - 90% of the facilities contacted do have data and will be receiving letters requesting copies of the test reports.
- Jeff Shumaker raised the issues of the intended audience for the RAP and whether changes can be easily made in the future. Jon Devine confirmed that the RAP should be considered a planning document for the Coordinating Committee (CC) that will be used by EPA to develop the White Paper for submission to the litigants.
- The subteams reviewed the datasheets included in the draft RAP. Subteam 1 is still deciding on an appropriate cut-off level for percent pathological waste fired in the definition of a pathological waste incinerator. Rick Crume requested that the subteam consider the units that may be excluded by a definition and not just those the definition includes. Subteam 2 reported that they are nearly finished with their database work and have found that their units may be similar enough to justify a single subcategory. Subteam 3 has developed four subcategories, but there are very few units in any of them. Subteam 4 presented their updated datasheet and their plans for emission testing.
- Subteam 1 discussed their testing recommendations. They will forward a revised copy of the recommendations to the Work Group for suggestions. The revisions may be forwarded to Rick Crume for inclusion in the Incinerator Work Group (IWG) presentation at the next CC meeting.
- Subteam 3 has determined that the 11 units identified as having controls do not belong in any of the subteam's categories. They will be turfed to the appropriate Work Groups. The subteam will continue calling their remaining 23 units and forward any information obtained to ERG.

- The Subteam 4 report on their preliminary testing needs for drum reclaimers was accepted by the IWG for submittal to the CC. The testing needs for the metal parts reclaimers require further consideration and will be addressed at a later date.
- The IWG reached consensus on recommending to the CC that units for scrap metal recovery, halogenated off-gas and landfill gas be referred to EPA to be addressed under non-ICCR MACT standards.
- Beth Berglund offered an update on the Pollution Prevention Subgroup formed by the CC. The subgroup reached consensus on a draft of an Operator Training/Qualification document. The Subgroup will provide a package at the next CC meeting of consensus documents and concept papers outlining the work done by the subgroup.
- Susan Radomski reported that 2051 of the 3200 surveys sent out in the second mailing of the ICR have been received and will be included in the next version of the Survey Database. These returns include information on over 600 units. Also, about 40 reports are being added to the Emission Test Database, the next version of which should be completed by the end of April.

Upcoming Meetings

- The current Work Group meeting schedule is as follows:
 - May 27 and 28: Subteam and Work Group meetings scheduled in Durham, North Carolina.
 - July 7: Incinerator Work Group meeting - at the Pittsburgh airport.

Action Items

- Paul Rahill will forward a copy of his subteam's testing recommendations to the IWG for revisions. Any changes should be forwarded to Rick Crume.
- Subteam 3 will decide if their three wood categories should be combined into a single category for the purpose of the RAP. If they decide to combine the categories, they will forward their completed data sheet to Rick for inclusion in the draft RAP presented at the next CC meeting.

- Rick Crume will follow up on the distribution of the emission test reports as EPA receives them.
- Rick Crume and ERG will discuss a method of distribution of the newest survey responses.
- Rick Crume and Norm Morrow will incorporate several suggestions on RAP, including a place holder for Pollution Prevention in the RAP draft to be presented to the CC.

ATTACHMENT 1

FINAL AGENDA
ICCR INCINERATOR WORK GROUP

AGENDA
INCINERATOR WORK GROUP MEETING

April 7, 1998, 9:00 am to 4:00 pm
CMA Headquarters Building
Rosslyn, VA

MEETING OBJECTIVES

- # Review draft RAP introductory paragraphs, section 112 recommendations, subcategory definition sheets, and testing recommendations.
- # Revise above drafts based on group discussion.
- # Assemble revised draft RAP sections into a progress report for the April 28-29 Coordinating Committee Meeting.

Note: Draft RAP introductory sections and subteam definition sheets will be posted prior to the April 7 IWG meeting. It is important that IWG members carefully review these posted materials prior to the meeting so that review comments can be discussed first thing in the morning.

AGENDA

- 9:00 am Call to order and welcome -- *Rick Crume*
Approval of agenda -- *Scott Warner*
Review of meeting objectives -- *Norm Morrow*
- 9:10 am Announcements and updates -- *Rick Crume*
- 9:15 am Discussion of draft RAP introductory paragraphs, section 112 recommendations, subcategory definition sheets, and testing recommendations -- *Group*
- 10:30 am SUBTEAM HUDDLES AND LUNCH
- 1:00 pm Finalization of sections and definition sheets for draft RAP and assembly into Coordinating Committee progress report -- *Group*
- 2:30 pm BREAK
- 2:45 pm Any updates on pollution prevention, BWG/PHWG coordination, economics coordination, solid waste definition, and databases -- *Group*
- 3:00 pm Where do we go from here? -- *Rick Crume*

3:45 pm **Wrap-up**

Scheduling of future meetings/teleconferences -- *Norm Morrow*

Other business -- *Group*

Flash minutes -- *Susan Radomski*

4:00 pm **Adjourn -- *Rick Crume***

ATTACHMENT 2
MEETING PARTICIPANTS

Meeting Participants

Name	Affiliation
Ethan Begg	Missouri Department of Natural Resources
Beth Berglund	Merck & Co, Inc.
Richard Crume	U.S. EPA/OAQPS
Jon Devine	U.S. EPA/OGC
Larry Faith	Shell Development Company
Doug Finan	GlaxoWellcome, Inc.
Dave Maddox	Stanley Furniture Company
David Marrack	Galveston-Houston Assoc. for Smog Prevention
Norman Morrow	Exxon Chemical Americas
Bill Perdue	Pulaski Furniture Corporation
Susan Radomski	Eastern Research Group, Inc.
Paul Rahill	Industrial Equipment and Engineering Company
Ed Repa	National Solid Wastes Management Association
Andrew Roth	Regional Air Pollution Control Agency (Ohio)
Chris Sarsony	Eastern Research Group
Jeff Shumaker	International Paper
Larry Thompson	Cornell University College of Veterinary Medicine
Tom Tyler	Institute of Scrap Recycling Industries, Inc.
Dick Van Frank	National Audubon Society
Dale Walter	Industrial Equipment and Engineering Company
Scott Warner	Eastern Research Group
Ed Wheless	Los Angeles County Sanitation District
Bill Wiley	Consumat Systems, Inc.
Dana Worcester	Association of Container Reconditioners

ATTACHMENT 3

AGRICULTURAL UNITS IDENTIFIED BY SUBTEAM 3

Agricultural Units

IWG MEETING
April 7, 1998
Washington D.C.

Certain combustion units were identified in the database as belonging to, or associated with, various agricultural activities. In order to clearly understand the true nature of these units, members of Subteam #3 individually contacted each facility. The following analysis details the result of these contacts.

ICCR#	COMPANY NAME	MATERIALS COMBUSTED OR STATUS	SUBTEAM OR GROUP	
			TYPE OF UNIT	ASSIGNED TO
170311263	Cargill-Oilseed Processing Division	No longer has an incineration unit	N/A	-
171130074	Funk Seed International Inc	UNKNOWN – Cannot contact	Unknown	-
26059E225	Glei Nursery and Retail Store	Cardboard, plastics, packing material	Incinerator	Small MWC Group
28123W301	Green Acres Farms Inc	No longer has an incineration unit	N/A	-
410512771	Clpenrose Dairy Innc	No longer has an incineration unit	N/A	-
42043E100	Pennsylvania Dept of Agriculture	Pathological wastes	Incinerator	Subteam #1
48133W061	Birdsong Peanuts	Cardboard, packing material	Incinerator	Small MWC Group
48241W159	Temple Eastex	Wood waste, wood bark, tree limbs	Boiler	Boiler WG
481890007	Pioneer Hibred International	No longer has an incinerator unit	N/A	-
550090344	Land O Lakes Inc (Former) Denmark WI Facility (Current)	No longer has an incineration unit	N/A	-
480390038	Ramsey I	Phone disconnected, business closed	N/A	-
171750009	FMC Corp Ag Chemical Group	Cardboard, paper, office trash	Incinerator	Small MWC Group
170070023	International Ingredients Corp	Cardboard, paper, office trash	Incinerator	Small MWC Group
060850015	Grace Sierra Horticultural (Former) Scott Sierra Company (Current)	Mineral spirits from fertilizer processing	Incinerator	Subteam #2
42091E160	Rosenbergers Dairies	Cardboard, paper, trash, wood, plastics	Incinerator	Small MWC Group
550750390	Friday Canning Corp	Wood pallets, wood crates	Process Heater	Process Heater WG
42005E100	Altmeyer Farm and Stable	Animal remains	Incinerator	Subteam #1
290710124	Gray Summit Research Farms	Animal remains	Incinerator	Subteam #1

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Other Units Misidentified in Data Base

<u>ICCR #</u>	<u>FACILITY NAME</u>	<u>COMBUSTER ID#</u>	<u>IDENTIFIED AS</u>	<u>ACTUALLY</u>
42091E125	Knoll International, Inc	46-301190	Incinerator	Boiler
42025E100	Heritage Frame & Glass Creations, Inc	Q01	Incinerator	Process Heater

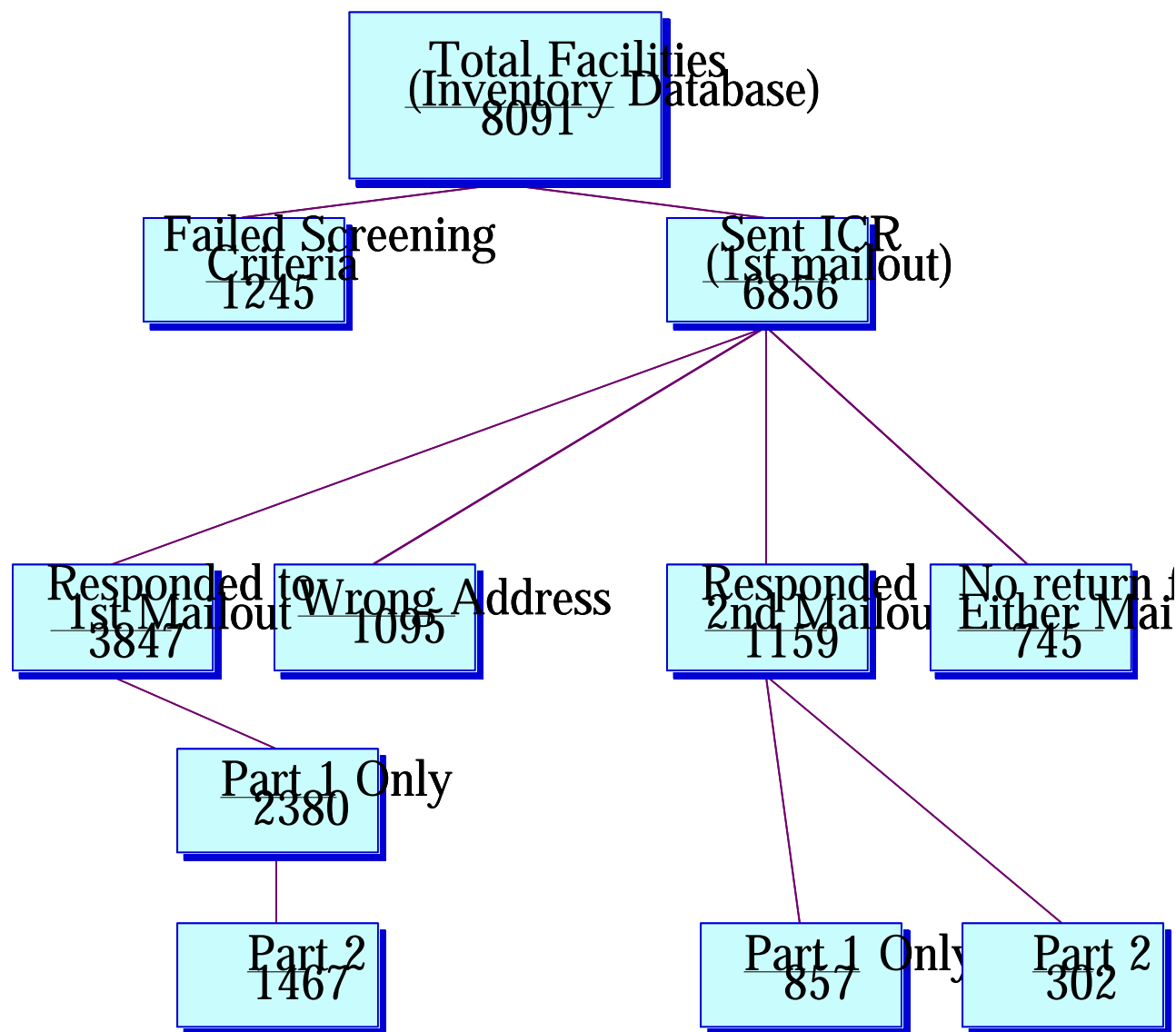
ATTACHMENT 4

DRUM RECLAIMER DATA SHEET

ATTACHMENT 5

PRELIMINARY TESTING NEEDS FOR DRUM RECLAIMERS

Inventory vs. Survey Database Population



ATTACHMENT 6
INCINERATOR ICR RESPONSE

PRELIMINARY TESTING NEEDS FOR THE DRUM RECLAIMER UNIT SUBCATEGORY

Prepared by: IWG Subteam # 4

Date: April 10, 1998

PURPOSE AND NEED FOR TESTING: IWG subteam #4 is concerned over the paucity of emissions data for certain Section 129 pollutants. Subteam #4 has conducted an extensive search for test data to characterize drum reclaimer emissions, including appeals for stack test data through the industry trade group (the Association for Container Reconditioners [ACR]), searches for test data and technical documents through EPA and state agency resources, and searches for existing state air permits that specify emission limits. While some data have been obtained, we have only a single reference for several pollutants with very questionable data quality. The IWG requests three stack tests to fill these data gaps. The requested stack tests are listed below in order of priority.

SUMMARY OF CURRENTLY AVAILABLE TEST DATA: The ICR survey did not identify any HAPs emission data for drum reclaimer unit survey respondents. The trade group has found a single reference for some Section 129 pollutants. No data exist to characterize small drum furnaces.

COMBUSTION UNIT AND WASTE DESCRIPTION: Typically these units are semi-continuous tunnel furnaces equipped with an afterburner. Process rates range from 100 to 500 55-gal drums per hour. Container residues may include hazardous materials. Containers must be empty as defined by RCRA prior to furnace processing.

NUMBER OF COMBUSTION UNITS AND TESTS: The IWG proposes to test 3 drum reclaimer units. The first priority would be a full sampling program of Section 129 pollutants on a mid-large size drum furnace that is at least 15 years old. The second priority would be a smaller capacity drum furnace owned by a company meeting the SBA definition of a small business. The third priority would be a mid-large size drum furnace that is newer than 15 years old.

OPERATING CONDITIONS: The units would operate at or near the maximum rated/permitted capacity and would utilize a thermal oxidizer. Operating conditions would be representative of normal operating conditions.

POLLUTANTS: All Section 129 pollutants concurrently.

CANDIDATE FACILITIES FOR TESTING: The ACR is currently working with its membership to identify facilities meeting the criteria of the IWG.

LEVERAGING OF RESOURCES: The ACR will assist in identifying good candidates for testing. They also will be liaison between EPA and the facility.